

Application Privacy Notice

(Short From Review Draft)

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What Information We Collect

The information we collect about your broadband performance is anonymous. No unique or persistent identifier is associated with any data we collect from you.

[Pop-up for underlined text: We do not identify the data we collect from you with anything that would directly identify your handset. Your data simply becomes part of the total anonymous pool of data that we collect in the program. Because your data appears together with data collected from all other participants, the risk of someone being able to successfully identify an individual participant's data is minimal.]

We collect five kinds of information to measure the broadband performance of your mobile broadband service.

- Location
 - **Pop-up text to display** When we measure your mobile broadband performance, we identify the location and unique ID of the cell tower that is providing your mobile broadband service, and the GPS location of your device at when the measurements were made.
- Time of data collection
 - **Pop-up text to display** When we measure your mobile broadband performance, we record the time the measurements were performed. Some measurements function by recording a start and end time.
- Handset type and operating system version;
 - **Pop-up text to display** When the measurement application starts, we record the manufacturer and model of phone you are using, and the version of the Android operating system installed on your phone.
- Cellular performance and characteristics;
 - **Pop-up text to display** We collect information about your cellular phone performance, such as the strength of the radio signal, service provider and what type of connection (3G or 4G) service you have with what carrier.
- Broadband performance to specific locations on the Internet
 - **Pop-up text to display** The software you install tests your mobile broadband upload and download rate, round trip latency, and packet loss measured between your handset and servers managed by the FCC, the FCC contractor, and other project partners.

You can find more detail in the FCC's technical summary of this program. [URL for technical summary]

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Third Party Data Sharing

The data we collect is helpful for consumers, the FCC, and others interested in understanding mobile broadband in the United States.

We share your broadband performance information in four ways.

- **Internally**

We may share your mobile broadband performance information within the FCC to write our Measuring Broadband America Report on Mobile Performance and to support our development of broadband policy.

- **Third-Party Partners Who Help Us Run Our Test and Support our Program**

We share your mobile broadband performance information with our contractor who manages our program, partners who support our program and architecture in other ways, and with partners supporting our analysis or contributing peer reviews.

[Pop-up text for underlined contractor: The FCC has contracted with a broadband measurement company, SamKnows privacy policy (URL www.samknows.com/privacy), to conduct the technical functions of the program and help manage the trial. SamKnows performs such functions as writing and maintaining the software that performs the measurements, responding to customer service requests, managing your application for the execution of tests, collecting and protecting data gathered in the trial, and analysis and support for the preparation of reports. The terms of the contract include obligations to protect the data and your privacy and can be found at (URL for contract).]

[Pop-up text for underlined partners supporting program and architecture. Research networks and your carrier may also provide support various aspects of the testing and architecture for the program. Information we collect may be shared with these parties solely for the purpose of conducting the trial, and only subject to non-disclosure agreements that include strict requirements for safeguarding the data. Academic research networks operated by Measurement Lab (URI <http://www.measurementlab.org/content/privacy-policy-aup>) and Level 3 (URL to Privacy Policy) Communications also support limited technical functions of the measurement process by providing access to servers on the Internet networks they manage, and may maintain logs that reference Internet Protocol aspects of the test traffic. Measurement Lab collects and discloses the Internet Address of your handset for tests that execute against their network, subject to their privacy policy. (URL <http://www.measurementlab.org/content/privacy-policy-aup>)]

[Pop-up text for partners for analysis and peer review: The FCC works with academics and its contractor to analyze the collected data for privacy risks or concerns, and plan for future measurement efforts. We may share with academics supporting our data processing and analysis your detailed mobile performance data for the specific purpose of identifying patterns in the data, and recommending ways of addressing any concerns for your privacy and anonymity. These partners are required to sign a non-disclosure agreement, and must agree to data handling practices that safeguard the data. The agreement prohibits any public disclosure of the data except in the form of a report to the FCC, limits both the time and specific research purposes of data, and requires disclosures if the data is ever compromised in any way. (URI in sentence: <link to NDA>) These academics are skilled in the field of statistics and computer science to identify patterns that a third party might exploit in ways to limit your privacy in the raw information, for example by comparing the location information with other sources of information. If we identify concerns we may take steps to address concerns by coarsening the time or location information, or deleting some information outright.]

- **Data Available to the Public**

We will publish aggregated averages and minimally necessary datasets that support our review of our statistics that we determine pose very low risks to your privacy.

Aggregated Data

We publish averages and other aggregated statistics that describe important features of mobile broadband performance. These highly aggregated statistics pose very low risks to your privacy.

Processed Coarsened Raw Data

We publish the underlying processed and coarsened anonymous data that supports the averages and other statistics that we publish in our reports. An analysis by ourselves and academics skilled in the field of statistics and computer science identifies any patterns in the data that we collect that could be exploited to compromise your privacy in the raw information. If we find concerns, we take steps to address the risks by coarsening the time, location or other information, limiting the combinations of information we release, or deleting outright information that poses concerns.

[Pop-up text for: For example, the analysis we perform would identify and address risks from a third party with access to a data you have already provided to compare the location information in the data we collect with other sources of information to try to identify your handset in our database. We will publicly release the results of this analysis to ensure the quality of our review, together with the measures we took to protect your anonymity. We will not release individual volunteer's time and location information publicly.

- **Pursuant to legitimate requests by law enforcement or where otherwise required by law or regulation**

We may share mobile broadband performance data collected by this application subject to legitimate requests by law enforcement or where otherwise required by law or regulation.

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Other reference materials regarding our privacy policy

[URL to respective documents]

- Data Usage Summary
- Detailed Testing Architecture and Technical Summary
- Terms and Conditions of Use
- Long Form Privacy Policy Statement
- Program Stakeholders’ Code of Conduct

[“Next” Button to Break to Terms and Conditions (Consent Pages)]